

unable to meaningfully address the question of whether the SCM model can be used to develop reasonable rates for BSEs.

Pursuant to the Designation Order, US West retained the services of an "independent auditor" to produce a report. This resulting Andersen Report, a secondary source of information, does not constitute an effective substitute for the ability of MCI and other intervenors to directly evaluate the model and to conduct their own analyses. Moreover, the substantial redactions in the copy of the report provided to intervenors, even those who had executed US West's extensive proprietary agreement, make a full analysis of the study's methods impossible.<sup>32</sup>

C. Secondary Sources Reveal the Subjectivity of the Model

1. The Redacted Andersen Report Reveals the Model is Subject to Manipulation and a Number of Changes to Input Data Since US West's Previous Filing

While MCI has been denied the opportunity to independently verify the conclusions of the SCM, it can be shown that the information presented by secondary sources suggests the extent of subjectivity in the model. The redacted Andersen report reflects a recognition that "[t]he Commission required that the review determine all the ways US West can manipulate the updated SCM

---

<sup>32</sup> Because of this limitation, MCI's comments on the content of the Andersen Report should not be viewed as an implicit endorsement of the methodology used or results obtained.

software to reflect assumptions US West can make regarding its network". The report also states that its tables 4.1 - 4.7 identify "the SCM variables and constants which US West controls."<sup>33</sup> [emphasis added]. Despite this requirement, US West provided MCI with a copy of tables 4.1 - 4.4 only, omitting tables 4.5 - 4.7; all numerical values, some variable names, and other information in these tables have been redacted. MCI, therefore, cannot comment either on the methodology or results of the report's analysis.

However, the report makes some startling statements which must be brought to the Commission's attention. It states that

"[t]here is a direct relationship in most cases between estimates of feature usage which are determined by US West and BSE unit investments.... In some cases, changes in the consumption rates' per occurrence of a feature, such as the time per attempt or call, also have significant effects.... Switching system functional category investments used in calculating BSE unit investments are significantly affected by changes in certain variables, such as calls per line, CCS [one hundred call seconds] per line, line concentration ratios, etc. which are set by US West.... Changes in discount factors also have a significant effect."<sup>34</sup>

The report additionally states that "US West made a number of changes to the SCM model and input data between the two rate filings. Several of these caused very significant changes in BSE unit investments."<sup>35</sup>

While MCI does not have access to the information necessary

---

<sup>33</sup> Andersen Report, at 5.

<sup>34</sup> Id. at 5-6, 14-16.

<sup>35</sup> Id. at 6, 17-20.

to validate the redacted Andersen Report's quantitative results, the report clearly states two key facts that underscore MCI's concern: First, US West and its analysts have control over a number of inputs to the SCM -- in other words, inputs to the model are established on a subjective basis. Second, changes in input assumptions of the model can result in the calculation of "significantly different unit investment estimates."<sup>36</sup>

The redacted Andersen Report also raises an additional area of concern, which MCI can neither support nor refute because of its limited access. On page 7 of the report, it is stated that "[t]he comparison of SCM and SCIS unit investments showed in most cases the two models produce significantly different unit investment estimates."<sup>37</sup> Such a conclusion, if accurate, further demonstrates the subjectivity of any cost development process that utilizes these models.

2. A Wide Discrepancy Exist Between the Rates US West "Justified" in its Previous Filing and the Rates US West Currently Proposes

The wide discrepancy which exists between the rates US West had "justified" in its previous filing and the current one, renders suspect the reasonableness of the SCM's ability to establish reasonable, cost-based rates. The Designation Order in the present investigation requires US West to show the "effect of

---

<sup>36</sup> Id. at p. 7.

<sup>37</sup> Id.

the correction on the unit investment figures developed using the updated SCM software."<sup>38</sup> US West displayed this in Appendix A to its Direct Case. Of the six BSE rates which US West developed using SCM, all but one was drastically reduced by the corrections US West made.<sup>39</sup>

The greater part of the changes in the rates were due to changes in the investment levels mandated by the Commission. The Commission required US West to correct its investment figures reflecting a model office representative of US West's entire service area, using forward-looking technology and current vendor traffic studies, vendor operating software, and vendor data. The details concerning which of these changes caused the reductions are contained in Appendix B of US West's Direct Case, which US West claimed was proprietary and not subject to intervenor inspection. Without this Appendix, MCI cannot determine the source of these changes or verify their accuracy.

## II. INVESTIGATION PROCEDURES ARE TOTALLY INADEQUATE

### A. Employing Procedures Designed to Limit Intervenor Participation Guaranteed Disastrous Results

Unfortunately, MCI's inability to meaningfully participate in this investigation was predictable, given the procedures designed to limit intervenor participation that were in place.

---

<sup>38</sup> See Designation Order at para. 10.

<sup>39</sup> Reductions in variables range from 25% for Caller ID to 90% for Call Forwarding.

As MCI explained in its Petitions for Reconsideration of the ONA Final Order,<sup>40</sup> and the SCIS Disclosure Review Order,<sup>41</sup> the "Redaction II" version of the "SCIS" cost model used by other BOCs and made available in the ONA Tariff Investigation was as useless to intervenors as the admittedly inadequate "Redaction I," and the restrictions placed on intervenors by the Model Nondisclosure Agreement in the SCIS proceeding were entirely unreasonable. The resulting lack of access to vital data precluded any meaningful participation in the ONA Tariff Investigation, resulting in unlawful secret ratemaking. By repeating similar procedures in the Designation Order and allowing a similarly redacted model and restrictive nondisclosure agreement for US West's SCM as were applied in the ONA Tariff Investigation, the Bureau guaranteed the same disastrous results from the start.

B. Confidentiality Procedures Will Ensure Secret Ratemaking, in Violation of the Communications Act, Commission Policy and the Administrative Procedure Act

Unfortunately, by denying MCI access to unredacted cost support information and imposing on intervenors a nondisclosure agreement for access merely to redacted information, the Commission has violated its obligations under the Communications

---

<sup>40</sup> See supra footnote 2.

<sup>41</sup> Id.

Act,<sup>42</sup> the Administrative Procedure Act (APA) and Constitutional Due Process protections. As the Commission has established, LEC cost support information is public information,<sup>43</sup> and the disclosure of such information comports with the APA's fundamental interest in deciding administrative matters on a public record, and the strong statutory preference for disclosure established by the Freedom of Information Act.<sup>44</sup>

By the Commission's allowing US West to support the rates in its tariff transmittal with secret cost information, effective public participation in this investigation has been denied. A

---

<sup>42</sup> Section 203 and 412 of the Communications Act, as amended, mandate the tariff-filing obligation and the public nature of tariffs. A tariff is a public document and must be supported, to the extent required, with information as available to the public as the tariff itself. Section 203(a) of the Communications Act requires that tariff filings "contain such other information as the Commission may by regulation require...." Moreover, Section 203(b)(2) grants the Commission authority to modify tariff requirements either in particular instances or by general order. Section 412 requires such tariff filings to be preserved as public records. Commission policy provides the public with a crucial role in the tariff review process. To implement Section 203 of the Communications Act, the Commission adopted Part 61 of its Rules to establish requirements pertaining to tariff filings. Section 61.38 of the Rules requires that specific kinds of supporting data and explanations accompany tariffs be filed by "dominant carriers" or those found by the Commission to have "market power" or the ability to control prices, a classification which applies, beyond dispute, to US West. Also implementing Section 203, Section 61.49 of the Rules prescribes specific supporting information to be submitted with letters of transmittals for tariffs of carriers to Price Cap regulation, to which US West is subject.

<sup>43</sup> SCIS Disclosure Review Order, *supra*. note 8 at 1532-33. However, MCI disagrees that this conclusion can be reached by performing a "balancing test" and with the outcome of the Commission's application of its test in the SCIS Disclosure Review Order.

<sup>44</sup> Id. at 1532.

Commission approval of the proposed rates at the close of this investigation would have to be based on non-public records. Under these circumstances, the Commission has denied the effective participation of interested parties.

It is elementary that an agency's failure "to disclose the information upon which it relies" violates "quasi-adjudicatory" informal "notice" and "hearing" requirements. See U.S. Lines Inc. v. FMC., 584 F.2d 519, 535, 539 (D.D. Cir. 1978). As indicated in U.S. Lines, the public's right to a "hearing" "upon reasonable notice under a Section 204 proceeding is effectively nullified when the agency decision is based... on... secret points...." Id. at 539.

By permitting such secrecy, as in U.S. Lines, there has been "no such opportunity.... for a real dialogue or exchange of views." Id. at 540. Such secret decision-making does "violence not only to" Section 204 "but to the basic fairness concept of due process" Id. at 541,<sup>45</sup> and therefore to the entire tariff review process as well.

Commission decision-making based on secret data with the concomitant failure to disclose essential public material is arbitrary and capricious.<sup>46</sup> To avoid this result, "the critical role of adversarial comment" requires timely disclosure of essential data, Id. at 542, independent of the agency's reliance

---

<sup>45</sup> See also Sea-Land Service, Inc. v. FMC, 653 F.2d 544, 551-52 (D.C. Cir. 1981).

<sup>46</sup> See U.S. Lines, supra, 584 F.2d at 533-35, 541-43.

on undisclosed data in its decision. Id. at 534. See also, Home Box Office, Inc. v. FCC, 567 F.2d 9, 555 (D.C. Cir.), cert. denied, 434 U.S. 829 (1977) (citing need for "adversarial discussion among the parties").

If the Commission were to approve tariffs based upon confidential supporting data with no reasonable relationship to any legitimate interest, as in American Lithotripsy Society v. Sullivan, 785 F. Supp. 1034 (D.D.C. 1992), the "public" would not be provided "a chance to comment on the methodology the agency used to derive a rate from the data... [T]he agency... cannot function properly without having the benefit of such comments before its makes any final decisions."<sup>47</sup> Thus, denial of access to the underlying tariff support data has subverted the Communications Act, as amended, and Commission policies.

#### CONCLUSION

US West has failed to demonstrate, as required by law and the Commission's order instituting this investigation, that its proposed rates are just and reasonable. If the Commission approves the rates proposed by US West, it will be granting US West substantial flexibility to pick and choose among methodologies and assumptions as needed in order to ensure that

---

<sup>47</sup> Id. at 1036. See also, Portland Cement Ass'n v. Ruckelshaus, 486 F.2d 375, 392 (D.C. Cir. 1973), cert. denied, 417 U.S. 921 (1974) (citing "refusal of the agency to respond to what seemed to be legitimate problems with the [agency's] methodology" as "a critical defect in the decision-making process").



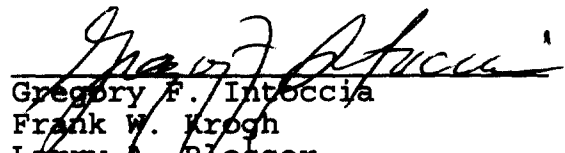
cost results are consistent with marketing plans. Because of the virtually unlimited pricing flexibility that results, the Commission effectively will have abdicated regulation of access services for the provision of enhanced services.

MCI urges the Commission to act promptly to ensure that US West's ONA tariffs are brought into compliance with the requirements of the law.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:

  
Gregory F. Intocchia  
Frank W. Krogh  
Larry A. Blosser  
Donald J. Elardo  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 887-2411

Its Attorneys

Donald Wood  
J. Christopher Frentrup

Its Analysts

May 11, 1995

**EXHIBIT A**



MCI Telecommunications  
Corporation

1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20006  
202 887 2411  
FAX: 202 887 3175

Gregory F. Intoccia  
Senior Regulatory Attorney  
Regulatory Law

VIA HAND DELIVERY

Robert B. McKenna, Esq.  
US West Communications, Inc.  
Suite 700  
1020 19th Street, N.W.  
Washington, D.C. 20036

March 17, 1995

Dear Mr. McKenna:

As US West requested in "Attachment D" of its direct case before the Federal Communications Commission in CC Docket No. 94-128, MCI has made arrangements to attend a US West SCM review session on March 22, 1995. Doree Cordoviz of US West communicated to me yesterday that US West has declined MCI's request for more time than the one three-hour session that US West has offered. As this duration of time is likely to substantially impede MCI's ability to complete its analysis of the SCM, MCI will attend the SCM session under protest of this issue.

To have any chance of performing at least a partial analysis at the SCM session, MCI believes that other conditions are necessary, and therefore requests that US West make the following arrangements for the session:

- (1) US West should make available a complete, functioning, unaltered, and unredacted version of the software, properly installed on hardware with the capability to "run" the model in a reasonable amount of time (i. e. computer hardware with capabilities greater than or equal to the capabilities of the hardware used by US West's analysts to run the model), subject to the provisions of (a) below.
  - (a) The only alteration that should be made to the model software is the "masking" of switch vendor specific data regarding switch performance characteristics and US West-specific vendor discounts. To be clear, MCI expects that these data will be included in the model, and that the model will, when provided with the inputs used by US West, accurately produce the outputs used by US West in its rate development process described in Appendix A to its March 8, 1995 direct case in the proceeding. By "masking," MCI means that it will not have any access to this information, but that the SCM model software provided will be able to access and utilize the information in its unaltered form.

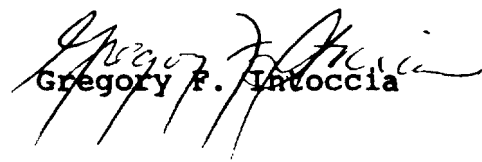


- (2) Prior to direct access to the software model, MCI expects that all written documentation for the SCM model be provided in an unredacted form, subject only to the limitations described in (1)(a) above. Documentation should include all written descriptions of the features and functions of the model and all instructions to analysts regarding use of the model (including training materials). In light of the fact that MCI and its experts do not have experience in working with this software model, this information should be provided to us immediately, at the very least no later than Monday, March 20, 1995.
- (3) The model software should include all input screens in their original format; labels identifying inputs, specifying acceptable ranges of information, and specifying required data formats should not be redacted or altered in any way.
- (4) The model inputs used by US West, including model office assumptions and characteristics, should be included in the software provided. In other words, the model provided should include all input data necessary to accurately reproduce the SCM outputs used by US West in the rate development process in Appendix A, in order for MCI to access the use of the model and to provide a reliable "baseline" to conduct an economic sensitivity analysis.

MCI has not yet received a response from your office concerning whether US West intends to execute MCI's proposed "Nondisclosure and Protective Agreement to Govern Docket No. 94-128". Please inform us of US West's intent.

A written response is requested.

Sincerely,

  
Gregory P. Intoccia

Enclosures

cc: FCC, Mr. Steven Spaeth



MCI Telecommunications  
Corporation

1801 Pennsylvania Ave. N.W.  
Washington, D.C. 20006  
202 887 2411  
FAX 202 887 3175

Gregory F. Intocca  
Senior Regulatory Attorney  
Regulatory Law

VIA HAND DELIVERY

Robert B. McKenna, Esq.  
US West Communications, Inc.  
Suite 700  
1020 19th Street, N.W.  
Washington, D.C. 20036

March 15, 1995

Dear Mr. McKenna:

Please inform me whether US West intends to execute MCI's proposed "Nondisclosure and Protective Agreement To Govern Docket No. 94-128". A copy was provided to your office by facsimile on March 7, 1995, and duplicate originals were sent to your office on March 8, 1995. MCI executed the duplicate originals and has requested that US West likewise execute them, then return one for our files. In view of the limited time that MCI has to address issues in this pending proceeding before the Federal Communications Commission, please provide a response to me by 5:00 p.m. on March 16, 1995.

MCI does not agree to the terms of the proposed "US West Switching Cost Model Access Agreement" that was attached to US West's direct case in CC Docket No. 94-128. This proposed agreement has the following major problems: (1) it does not address the treatment of competitively sensitive material (other than SCM documentation and software) that MCI may request in the proceeding, and (2) it is too restrictive in that: (a) it does not provide for electronic print capability at the review site, (b) intervenors "will not be permitted to remove any material from US West premises", presumably including notes and/or attorney work product, (c) MCI would not have access to all switch types within the SCM model, (d) only one attorney and two experts would be permitted in a SCM review session, and (e) information could not be shared with other intervenors who have signed similar access agreements with US West.

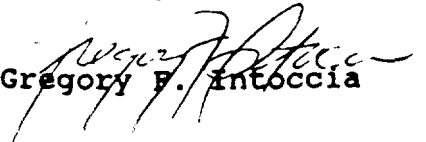
MCI has also reviewed the "Proposal for Intervenor Access to US West/Switching Cost Model (SCM)" and believes that the proposed schedule provides inadequate time for MCI to assess whether US West has complied with the proceeding's designation order. Moreover, in light of the participation of only three intervenors in the proceeding, US West's limiting each intervenor to only one three-hour session for SCM review is unreasonable.



MCI requests that US West execute the nondisclosure and protective agreement previously provided to your office, and that a reasonable period of time be allotted for accessing the SCM.

I look forward to hearing from you.

Sincerely,

  
Gregory F. Intoccia



MCI Telecommunications  
Corporation  
1801 Pennsylvania Ave. N.W.  
Washington, D.C. 20006  
202 887 2411  
FAX: 202 887 3175

Gregory F. Intoccia  
Senior Regulatory Attorney  
Regulatory Law

VIA HAND DELIVERY

Cyndie Eby, Esq.  
US West, Inc.  
Suite 700  
1020 Nineteenth Street, NW  
Washington, DC 20036

March 8, 1995

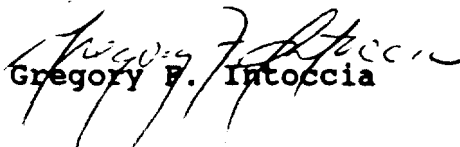
Dear Ms. Eby:

I have enclosed duplicate originals of a "Nondisclosure and Protective Agreement To Govern CC Docket No. 94-128" for use in the same numbered docket, In the Matter of Open Network Architecture Tariffs of US West Communications, Inc., pending before the Federal Communications Commission. MCI executed the documents and requests that US West likewise execute them, then return one for our files. For your convenience, enclosed is a self-addressed envelope for overnight delivery.

The executed agreement will ensure compliance with the Order Designating Issues for Investigation in the above proceeding, while also protecting competitively sensitive information.

Please let me know if you have questions.

Sincerely,

  
Gregory F. Intoccia

Enclosure



b. Materials marked as competitively sensitive may be disclosed to the following persons, only for use in the Proceeding:

(i) Counsel of record representing intervenors who have filed in the Proceeding (including their support personnel) and who have signed a similar nondisclosure and protective agreement;

(ii) Officers, employees, directors, agents, shareholders, consultants, or expert witnesses of an intervenor who are named by the intervenor as being directly involved in this proceeding; and

(iii) The FCC and its staff.

6. These individuals shall not disclose information designated as competitively sensitive to any person not authorized to receive such information, and shall not use the information in any activity or function other than for purposes of this Proceeding. Each individual who is provided access to the information shall sign a written declaration affirmatively stating that the individual has personally read this agreement and consents to be bound by its terms.

7. Any reference to competitively sensitive information in pleadings filed in this Proceeding shall be by separate supplemental or unredacted pleadings, which supplemental or unredacted pleadings shall be plainly marked to identify the contents as competitively sensitive, shall be separately filed with the FCC in sealed envelopes, and shall be distributed only to individuals who are permitted access to the competitively sensitive information.

8. Only for purposes of this Proceeding, attorneys of record and their support personnel may make electronic copies of competitively sensitive computer software provided by US West, but must destroy all such copies at the conclusion of this Proceeding. "Hard" or paper copies of competitively sensitive information may be made only for use by persons designated in this agreement. MCI shall maintain a log recording the number of electronic and hard copies made of all competitively sensitive information and the names of persons to whom the copies have been provided.

9. Upon conclusion of this Proceeding, including all appeals and petitions, all originals and hard copies of any competitively sensitive information, along with the log recording persons who received copies of such materials, shall be provided to US West. In addition, upon conclusion of the Proceeding, any notes, memoranda or other written materials containing competitively sensitive information derived in whole or in part from US West competitively sensitive materials (other than those which constitute attorney work product) shall be destroyed.



10. This agreement shall benefit and be binding upon the Parties hereto, their counsel, and each of their respective heirs, successors, assigns, affiliates, subsidiaries, and agents.

11. This agreement shall be governed in accordance with the laws of the District of Columbia.

MCI Telecommunications Corporation



(signature)

Gregory F. Intoccia

(printed name)

1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

(business address)

(202) 887-2411

(business telephone)

MCI Telecommunications Corp.

(counsel for)

March 7, 1995

(date signed)

US West Communications, Inc.

\_\_\_\_\_

(signature)

\_\_\_\_\_

(printed name)

\_\_\_\_\_

(business address)

\_\_\_\_\_

(business telephone)

\_\_\_\_\_

(counsel for)

\_\_\_\_\_

(date signed)

# DECLARATION

I, \_\_\_\_\_, hereby declare under penalty of perjury that I have received and personally read a copy of the Nondisclosure and Protective Agreement To Govern CC Docket No. 94-128, that has been entered into by MCI Telecommunications Corp. and US West Communications, Inc., and that I agree that I will be bound by its terms pertaining to competitively sensitive information. I further state that neither I nor any firms with which I am affiliated will use any said competitively sensitive information to which I obtain access pursuant to said agreement in connection with the development of any marketing strategies or plans of any firm, person, or entity and that I will use said competitively sensitive information exclusively for the purpose of participating in any and all phases of the Federal Communications Commission CC Docket No. 94-128, In the Matter of Open Network Architecture Tariffs of US West Communications, Inc., including administrative and judicial review.

---

EXHIBIT B

## Timeline of MCI's Attempts to Perform a Sensitivity Analysis Using the Redacted SCM Software

### Setup and Run Times<sup>1</sup>

Arrival at USWC premises at approximately 9:00

9:15 - 9:30      Creation of New Study within the established  
                         master file provided by USWC

9:30 - 9:35      Setup Office 1 (with Remotes)  
                         Remote 33  
                         Remote 53  
                         Remote 86  
                         Remote 104  
                         Remote 117  
                         Remote 126  
                         Remote 137  
                         Remote 157  
                         Remote 265

9:35 - 9:41      Run Office 1

9:41 - 9:43      Setup Office 10

9:43 - 9:47      Setup Office 100

9:47 - 9:51      Run Office 100

9:51 - 9:52      Setup Office 101

9:52 - 9:55      Run Office 101

9:55 - 9:56      Setup Office 102

9:56 - 9:59      Run Office 102

9:59 - 10:00      Setup Office 103

10:00 - 10:03      Run Office 103

10:03 - 10:04      Setup Office 104

---

<sup>1</sup>"Setup" time includes the selection of the office location, calculation of the revised value for the selected variable, and the change of the variable value. "Run" time includes only the time needed for the redacted model to process the change after the "Calculate and Save" command had been executed.

10:04 - 10:06 Run Office 104<sup>2</sup>  
 10:06 - 10:07 Re-Setup Office 104  
 10:07 - 10:10 Re-run Office 104  
 10:10 - 10:11 Setup Office 105  
 10:11 - 10:14 Run Office 105  
 10:14 - 10:18 Setup Office 106 (with Remotes)  
     Remote 16  
     Remote 119  
     Remote 130  
     Remote 177  
 10:18 - 10:21 Run Office 106  
 10:21 - 10:23 Setup Office 108  
 10:23 - 10:26 Run Office 108  
 10:26 - 10:27 Setup Office 109  
 10:27 - 10:30 Run Office 109  
 10:30 - 10:31 Setup Office 11  
 10:31 - 10: 34 Run Office 11  
 10:34 - 10:35 Setup Office 110  
 10:35 - 10:38 Run Office 110  
 10:38 - 10:42 Setup Office 111 (with Remotes)  
     Remote 101  
     Remote 114  
     Remote 263  
 10:42 - 10:45 Run Office 111  
 10:45 - 10:46 Setup Office 112  
 10:46 - 10:49 Run Office 112  
 10:49 - 10:53 Setup Office 113 (with Remotes)  
     Remote 12  
     Remote 13

---

<sup>2</sup>During the time required for processing Office 104, MCI's analyst noticed that the selected variable had been changed to an incorrect value. The correction of this operator error required that the office be re-run with the corrected value.

Remote 105

10:53 - 10:56 Run Office 113

10:56 - 10:58 Setup Office 114 (with Remotes)  
Remote 257

10:58 - 11:01 Run Office 114

11:01 - 11:02 Setup Office 115

11:02 - 11:05 Run Office 115

11:05 - 11:06 Setup Office 116

11:06 - 11:09 Run Office 116

11:09 - 11:12 Setup Office 117 (with Remotes)  
Remote 113  
Remote 135  
Remote 245

11:12 - 11:15 Run Office 117

11:15 - 11:16 Setup Office 118

11:16 - 11:19 Run Office 118

11:19 - 11:20 Setup Office 119

11:20 - 11:24 Run Office 119

11:24 - 11:27 Setup Office 12 (with Remotes)  
Remote 3  
Remote 41  
Remote 57  
Remote 242

11:27 - 11:30 Run Office 12

11:30 - 11:31 Setup office 120

11:31 - 11:34 Run Office 120

11:34 - 11:38 Setup Office 121 (with Remotes)  
Remote 50  
Remote 58  
Remote 87  
Remote 247  
Remote 251

11:38 - 11:42 Run Office 121

11:42 - 11:43 Setup Office 122

|               |   |
|---------------|---|
| 11:43 - 11:46 | Run Office 122  |
| 11:46 - 11:48 | Setup Office 123 (with Remotes)<br>Remote 141   |
| 11:48 - 11:52 | Run Office 123  |
| 11:52 - 11:53 | Setup Office 124  |
| 11:53 - 11:56 | Run Office 124  |
| 11:56 - 11:58 | Setup Office 125 (with Remotes)<br>Remote 90<br>Remote 128                              |
| 11:58 - 12:02 | Run Office 125  |
| 12:02 - 12:56 | Lunch Break   |
| 12:56 - 12:57 | Setup Office 126  |
| 12:57 - 1:00  | Run Office 126  |
| 1:00 - 1:01   | Setup Office 127  |
| 1:01 - 1:04   | Run Office 127  |
| 1:04 - 1:07   | Setup Office 128 (with Remotes)<br>Remote 131<br>Remote 154<br>Remote 160<br>Remote 200 |
| 1:07 - 1:10   | Run Office 128  |
| 1:10 - 1:12   | Setup Office 129  |
| 1:12 - 1:15   | Run Office 129  |
| 1:15 - 1:16   | Setup Office 13   |
| 1:16 - 1:19   | Run Office 13   |
| 1:19 - 1:20   | Setup Office 130  |
| 1:20 - 1:23   | Run Office 130  |
| 1:23 - 1:24   | Setup Office 131  |
| 1:24 - 1:27   | Run Office 131  |
| 1:27 - 1:28   | Setup Office 132  |
| 1:28 - 1:31   | Run Office 132  |

|             |   |
|-------------|---|
| 1:31 - 1:32 | Setup Office 133  |
| 1:32 - 1:35 | Run Office 133  |
| 1:35 - 1:36 | Setup Office 134  |
| 1:36 - 1:39 | Run Office 134  |
| 1:39 - 1:40 | Setup Office 135  |
| 1:40 - 1:43 | Run Office 135  |
| 1:43 - 1:44 | Setup Office 136  |
| 1:44 - 1:47 | Run Office 136  |
| 1:47 - 1:48 | Setup Office 137  |
| 1:48 - 1:51 | Run Office 137  |
| 1:51 - 1:52 | Setup Office 138  |
| 1:52 - 1:55 | Run Office 138  |
| 1:55 - 1:57 | Setup Office 139  |
| 1:57 - 2:00 | Run Office 139  |
| 2:00 - 2:01 | Setup Office 14   |
| 2:01 - 2:04 | Run Office 14   |
| 2:04 - 2:05 | Setup Office 140  |
| 2:05 - 2:08 | Run Office 140  |
| 2:08 - 2:10 | Setup Office 141 (with Remotes)<br>Remote 98                |
| 2:10 - 2:13 | Run Office 141  |
| 2:13 - 2:14 | Setup Office 142  |
| 2:14 - 2:17 | Run Office 142  |
| 2:17 - 2:19 | Setup Office 143 (with Remotes)<br>Remote 149<br>Remote 214 |
| 2:19 - 2:22 | Run Office 143  |
| 2:22 - 2:26 | Setup Office 144 (with Remotes)<br>Remote 9<br>Remote 36    |



|             |                                 |
|-------------|---------------------------------|
|             | Remote 120                      |
|             | Remote 142                      |
|             | Remote 150                      |
|             | Remote 217                      |
| 2:26 - 2:30 | Run Office 144                  |
| 2:30 - 2:31 | Setup Office 145                |
| 2:31 - 2:34 | Run Office 145                  |
| 2:34 - 2:35 | Setup Office 146                |
| 2:35 - 2:38 | Run Office 146                  |
| 2:38 - 2:39 | Setup 147                       |
| 2:39 - 2:42 | Run Office 147 <sup>3</sup>     |
| 2:42 - 2:43 | Re-Setup Office 147             |
| 2:43 - 2:46 | Re-Run Office 147               |
| 2:46 - 2:47 | Setup Office 148                |
| 2:47 - 2:50 | Run Office 148                  |
| 2:50 - 2:51 | Setup Office 149                |
| 2:51 - 2:54 | Run Office 149                  |
| 2:54 - 2:56 | Setup Office 15                 |
| 2:56 - 2:59 | Run Office 15                   |
| 2:59 - 3:00 | Setup Office 150                |
| 3:00 - 3:03 | Run Office 150                  |
| 3:03 - 3:04 | Setup Office 151                |
| 3:04 - 3:07 | Run Office 151                  |
| 3:07 - 3:09 | Setup Office 152 (with Remotes) |
|             | Remote 260                      |
|             | Remote 261                      |
| 3:09 - 3:12 | Run Office 152                  |

---

<sup>3</sup>During the time required for processing Office 147, MCI's analyst noticed that the selected variable had been changed to an incorrect value. The correction of this operator error required that the office be re-run with the corrected value.